

FINANCIAL DISCLOSURE REVIEWER TIPS

The director (or deputy director or division chief) or the Chief Administrative Officer reviews disclosure statements to see if:

- the answers are complete;
- there is any conflict of interest with the filer's official duties; or
- there is any potential conflict of interest with the filer's duties.

Some of the very common technical errors we see with reports include:

- Failure to list salary/income from County employment
- Failure to list spouse's salary/income
- Failure to list source of income in Section 4 including name and address of income source
- Failure to list debts (mortgage, car loans), especially if real property listed in Section 1 is subject to a mortgage
- Failure to list address and jurisdiction of house for which mortgage is owed
- Failure to list mortgage company
- Failure to list interest rates on all debts
- Failure to confirm that one has no mortgage or other debts
- Failure to list family members' jobs
- Failure to list stocks, bonds, etc. or to confirm that one owns none of these
- Failure to disclose details on stocks. Often, we will see reports that will list "Charles Schwab" as a holding and then state "stocks" without any detail on what is in the Schwab account.

Conflicts of interest analysis involves considering a disclosure statement and seeing if there is a potential relationship between the assets, property, or entities the employee or his family members are affiliated with and the filer's County position; can the filer affect anything reported on the form through exercise of the filer's official duties?

Note With Respect to Confidential Disclosure Statements:

As the content of a confidential financial disclosure statement is confidential, a reviewer is prohibited by the Public Ethics Law from disseminating any information in the statement, except where another public employee reasonably needs the information to carry out the employee's official duties.

If a reviewer unintentionally accepts a deficient disclosure, please contact Erin Chu at the Ethics Commission, either by telephone at x76676 or by email at Erin.Chu@montgomerycountymd.gov, for assistance.